

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

YOUNG CONSERVATIVES OF TEXAS §
FOUNDATION §

Plaintiff, §

v. §

THE UNIVERSITY OF NORTH TEXAS, THE §
UNIVERSITY OF NORTH TEXAS SYSTEM, §
NEAL SMATRESK, PRESIDENT OF THE §
UNIVERSITY OF NORTH TEXAS and §
SHANNON GOODMAN, VICE PRESIDENT §
FOR ENROLLMENT OF THE UNIVERSITY §
OF NORTH TEXAS; §

Defendants. §

CIVIL ACTION NO. 4:20-CV-973

JUDGE SEAN D. JORDAN

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF PLAINTIFFS’
MOTION FOR PROTECTIVE ORDER DKT # 44**

While performing research for another case, Plaintiffs came upon this recent district court opinion which is directly on point for Plaintiffs’ arguments raised at Dkt # 44, p. 7, and Dkt # 47, p. 5. *Marszalek v. Kelly*, No. 20-cv-04270, 2021 U.S. Dist. LEXIS 107613 (N.D. Ill. June 9, 2021). In particular, the case holds that uncontroverted declarations of association officials are sufficient to establish that an association has members with injuries sufficient for standing, and that in such circumstances, the names of such members need not be disclosed to establish standing. *Id.* at 10-11; 12-13. Defendants request for the names and contact information of *all* YCT members at UNT therefore goes well beyond the needs of this case and violates the First Amendment.

Respectfully submitted,

/s/Chance Weldon

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed on January 6, 2022, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Chance Weldon
CHANCE WELDON